

**CLARK GULDIN**  
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*Attorneys for Plaintiff*  
*1735 Jersey Ave LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

1735 JERSEY AVE LLC,

Plaintiff,

v.

LUXE LIVING DESIGN, LLC,

Defendant.

**HON. MICHAEL A. SHIPP, U.S.D.J.,  
HON. JUSTIN T. QUINN, U.S.M.J.**

**CIVIL ACTION NO. 3:24-cv-06175  
(MAS) (JTQ)**

**DECLARATION OF JONATHAN A.  
OZAROW, ESQ.**

I, Jonathan A. Ozarow, Esq., hereby certify under penalties of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of Clark Guldin Attorneys at Law, attorneys for Plaintiff, 1735 Jersey Ave LLC (“Landlord”). I submit this declaration based upon my personal knowledge and in opposition to the Order to Show Cause filed by Defendant, Luxe Living Design, LLC (“Tenant”).

2. A true and accurate copy of a letter, dated October 29, 2024, sent to Tenant’s counsel is attached hereto as **Exhibit A**.

3. After sending the foregoing letter, Tenant’s principal, Chaim Treitel, inadvertently disclosed that Tenant failed to procure all insurance required under the

express terms of the parties' lease agreement.<sup>1</sup> True and accurate copies of correspondence between counsel regarding this inadvertent disclosure are attached hereto as **Exhibit B**.<sup>2</sup>

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: November 13, 2024



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Jonathan A. Ozarow

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<sup>1</sup> I began reading this email correspondence as I did not immediately recognize the sender as being the Tenant's principal. I promptly ceased reading Mr. Treitel's email when I became aware that it was inadvertently sent and otherwise complied with RPC 4.4(b).

<sup>2</sup> As this Court is aware, Tenant's counsel has a history of offering false statements to Courts, which conduct resulted in a New Jersey State Court denying him *pro hac vice* admission and holding him in contempt. (ECF 5-9.) Due to this and other factors, I felt it prudent to remind Tenant's counsel as to ramifications for offering false statements to the Court.